

EXHIBIT I

In Re: Flint Water Cases, No. 5:16-cv10444
Initial Proposed Non-Party Discovery List
December 7, 2017

I. Non-Party Government Contractors and Consultants

Witness(es)	Organization/Entity	Description
John O'Malia	O'Malia Consulting, SEG Engineers	Mr. John O'Malia and O'Malia Consulting, SEG Engineers were involved in initial discussions with the City of Flint, the State of Michigan, and the Karagondi Water Authority (KWA) concerning the City joining the KWA and related financing issues. Mr. John O'Malia and O'Malia Consulting, SEG Engineers will likely have relevant documents pertaining to the City's decision to switch to the KWA.
Michael McDaniel	Flint Action and Sustainability Team Start	Project coordinator for the Flint Action and Sustainability Team Start program through November 22, 2017.
N/A	Goyette Mechanical Co.	Pipe replacement contractor for the City of Flint as part of the City's FAST Start Initiative.
N/A	WT Stevens Construction	Pipe replacement contractor for the City of Flint as part of the City's FAST Start Initiative.
N/A	Lang Construction	Pipe replacement contractor for the City of Flint as part of the City's FAST Start Initiative.
N/A	Waldorf & Sons	Pipe replacement contractor for the City of Flint as part of the City's FAST Start Initiative.
N/A	Zito Construction	Pipe replacement contractor for the City of Flint as part of the City's

In Re: Flint Water Cases, No. 5:16-cv10444
Initial Proposed Non-Party Discovery List
December 7, 2017

		FAST Start Initiative.
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II. Governmental Non-Parties

Witness(es)	Organization/Entity	Description
N/A	United States Centers for Disease Control and Prevention	The CDC participated in communications with state, city, and Genesee County officials in connection with lead exposure and Legionnaire's Disease issues during the relevant period.
N/A	United States Environmental Protection Agency	The US EPA was involved in the investigation of the presence of lead and legionella in the Flint water supply during the relevant period. The US EPA will likely have relevant documents concerning its investigation of the Flint water contamination.
N/A	Genesee County Health Department	The Genesee County Health Department will likely have documents, data, and correspondence relating to lead blood tests and legionella during the relevant period.
N/A	Detroit Water and Sewer Department (DWSD)	Supplied anti-corrosive treatments to Flint's water before terminating its contract with Flint effective April 2014 and resumed supplying treated water to Flint after it switched back to DWSD in October 2015.
John O'Brien	Genesee County Drain Commission	Engineer and Director of Water and Waste Water for the Genesee County Drain Commission who reviewed the FWTP before the

In Re: Flint Water Cases, No. 5:16-cv10444
Initial Proposed Non-Party Discovery List
December 7, 2017

		switch over to the Flint River.
N/A	Genesee County Waste Treatment Facility	The Genesee County Waste Treatment Facility will likely have information concerning water testing protocol, peer review testing, MDEQ licensing documents, and the maintenance of a waste water treatment facility.

III. Analytical Non-Parties

Witness(es)	Organization/Entity	Description
N/A	Brighton Analytical Associates, Inc.	Brighton Analytical tested the water from University of Michigan, Flint Campus water coolers that were found to contain elevated lead levels, as well as other water from the Flint Campus. Brighton Analytical Associates, Inc. also tested water for other Flint residents, businesses, and institutions during the relevant period.
N/A	Monarch Environmental, Inc.	Monarch Environmental, Inc. provided consulting services to University of Michigan, Flint Campus to evaluate the University's water in early 2015. Monarch Environmental, Inc. will likely also possess records of water evaluations performed during the relevant period for other Flint residents, businesses, and institutions.
N/A	Culligan Water Conditioning of Flint	Culligan Water Conditioning of Flint is an analytical laboratory in Flint, and will likely have data and results of water testing it

In Re: Flint Water Cases, No. 5:16-cv10444
Initial Proposed Non-Party Discovery List
December 7, 2017

Witness(es)	Organization/Entity	Description
		conducted for Flint residents, businesses, and institutions during the relevant period.
N/A	Global Treatment Solutions	Global Treatment Solutions is an analytical laboratory in Holly, Michigan, and will likely have data and results of water testing it conducted for Flint residents, businesses, and institutions during the relevant period.
N/A	Absolute Labs	Absolute Labs is an analytical laboratory in Rochester Hills, Michigan, and will likely have data and results of water testing it conducted for Flint residents, businesses, and institutions during the relevant period.
N/A	Novi Analytical Laboratories, Inc.	Novi Analytical Laboratories, Inc. is an analytical laboratory in Novi, Michigan, and will likely have data and results of water testing it conducted for Flint residents, businesses, and institutions during the relevant period.
N/A	University Labs	University Labs is an analytical laboratory in Novi, Michigan, and will likely have data and results of water testing it conducted for Flint residents, businesses, and institutions during the relevant period.
N/A	Edible Flint	Edible Flint collected soil samples for use in analyzing the presence and geographic distribution of lead and other toxic chemicals in the soil in Flint.

In Re: Flint Water Cases, No. 5:16-cv10444
Initial Proposed Non-Party Discovery List
December 7, 2017

IV. Investigative Non-Parties

Witness(es)	Organization/Entity	Description
Marc Edwards, PhD	Virginia Tech University: Flint Water Study Group	One or more of these affiliated proposed recipients have extensive physical evidence, including but not limited to data, photographs, and statements that Dr. Edwards and his colleagues have collected in the course of research and investigations they have conducted in or concerning the lead contamination in Flint, Michigan from April 2014 to present.
N/A	Virginia Tech University: Flint Water Study Group	One or more of these affiliated proposed recipients have extensive physical evidence, including but not limited to data, photographs, and statements that Dr. Edwards and his colleagues have collected in the course of research and investigations they have conducted in or concerning the lead contamination in Flint, Michigan from April 2014 to present.
Mona Hanna-Attisha, MD	Hurley Medical Center	One or both of Dr. Hanna-Attisha and Hurley Hospital have raw data on which Dr. Hanna-Attisha's report published as "Elevated Blood Lead Levels in Children Associated with the Flint Drinking Water Crisis: A Spatial Analysis of Risk and Public Health Response." Dr. Hanna-Attisha will likely also have communications related to her efforts to obtain information from government officials for use in her Flint-related studies. She and Hurley Hospital will also have medical records related to Flint residents they have treated for allegedly water-related illnesses.

In Re: Flint Water Cases, No. 5:16-cv10444
Initial Proposed Non-Party Discovery List
December 7, 2017

Witness(es)	Organization/Entity	Description
N/A	Hurley Medical Center	<p>One or both of Dr. Hanna-Attisha and Hurley Hospital have raw data on which Dr. Hanna-Attisha's report published as "Elevated Blood Lead Levels in Children Associated with the Flint Drinking Water Crisis: A Spatial Analysis of Risk and Public Health Response." Dr. Hanna-Attisha will likely also have communications related to her efforts to obtain information from government officials for use in her Flint-related studies. She and Hurley Hospital will also have medical records related to Flint residents they have treated for allegedly water-related illnesses.</p> <p>Study released by the Center showed significantly higher blood lead levels in Flint infants and children following the switch to the Flint River for raw water.</p>
Robert Bowcock	Integrated Resource Management, Inc.	Mr. Bowcock and other individuals at Integrated Resource Management, Inc. conducted investigations of water-related issues in Flint during the relevant period and likely have evidence generated in connection with the investigations.
N/A	Integrated Resource Management, Inc.	Individuals at Integrated Resource Management, Inc. conducted investigations of water-related issues in Flint during the relevant period and likely have evidence generated in connection with the investigations.
Erin Brockovich	N/A	Ms. Brockovich collaborated with Mr. Robert Bowcock in connection with his investigations in Flint and may also possess

In Re: Flint Water Cases, No. 5:16-cv10444
Initial Proposed Non-Party Discovery List
December 7, 2017

Witness(es)	Organization/Entity	Description
		evidence concerning the Flint water contamination.
N/A	Detroit Free Press	The Detroit Free Press provided coverage of events in Flint beginning in mid-2014 through the present. The Detroit Free Press may have documentation of relevant events as well as other information collected in connection with its coverage.
N/A	MLive	MLive provided coverage of events in Flint beginning in mid-2014 through the present. MLive may have documentation of relevant events as well as other information collected in connection with its coverage.

V. Miscellaneous Non-Parties

Witness(es)	Organization/Entity	Description
N/A	General Motors Corporation	GM switched water supplies to an alternative source following the use of the Flint River as a source of raw water for the FWTP due to corrosion of parts/equipment following the switch. GM likely possesses documents and communications with Flint regarding water corrosion. GM likely possesses documents related to the reasons for that decision and its communications with government official and others concerning it.
N/A	Lifetime Network	Lifetime produced the television movie entitled “Flint” and will

In Re: Flint Water Cases, No. 5:16-cv10444
Initial Proposed Non-Party Discovery List
December 7, 2017

Witness(es)	Organization/Entity	Description
		likely have relevant information collected from Flint residents and institutions by the persons who were involved in the making of the movie.
N/A	ACLU of Michigan	ACLU of Michigan produced the documentary film “Here’s to Flint” and will likely have relevant information collected from Flint residents and institutions by the persons who were involved in the making of the documentary.
Jacob Abernethy Arya Farahi Eric Schwartz Jonathan Stroud Cyrus Anderson Linh Nguyen Wenbo Shen Xinyu Tan Sheng Yang Chengyu Dai Adam Rauh Quangsha Shi Jared Webb	University of Michigan - Ann Arbor Campus	<p>University of Michigan - Ann Arbor Campus and/or Messrs. Abernethy et al. will likely have materials and data collected in connection with preparing the study <i>Flint Water Crisis - Data-Driven Risk Assessment Via Residential Water Testing</i>.</p> <p>Mr. Jacob Abernathy from the Michigan Data Science Team has also accumulated Flint Water data as part of a predictive analysis of probable lead pipes and other sources of lead contamination</p> <p>University of Michigan - Ann Arbor Campus will also have education, health, and counseling records related to plaintiffs who went to school at the Campus.</p>
N/A	University of Michigan - Flint Campus	University of Michigan - Flint Campus may have records of the assessment and testing of the Campus water during the relevant period. It also will have education, health, and counseling records related to plaintiffs who went to school at the Campus.

In Re: Flint Water Cases, No. 5:16-cv10444
Initial Proposed Non-Party Discovery List
December 7, 2017

Witness(es)	Organization/Entity	Description
Dr. Martin Kaufman	University of Michigan - Flint Campus, Geographic Information Systems (GIS) Center	Dr. Martin Kaufman lead the study to map all lead service lines in Flint.
N/A	Wayne State University	Wayne State University formed the Flint Area Community Health and Environment Partnership to evaluate possible associations between changes in Flint drinking water quality and the prevalence of disease and other possible medical conditions. Wayne State University will likely have data relevant to causation issues in the Flint Water cases.
Shawn McElmurry	Wayne State University	<p>Associate Professor, Civil and Environmental Engineering at Wayne State University.</p> <p>Conducted a study by Wayne State University into the link between the Flint Water and various reported illnesses. This study was done pursuant to a contract between Wayne State and the Michigan Department of Health and Human Services.</p> <p>Mr. McElmurry also drafted two articles: (1) <i>Four Phases of the Flint Water Crisis: Evidence from Blood Lead Levels In Children</i>; and (2) <i>What Happened and Why?</i></p>
N/A	Karagondi Water	New water authority contracted to supply raw water to Flint once the

In Re: Flint Water Cases, No. 5:16-cv10444
Initial Proposed Non-Party Discovery List
December 7, 2017

Witness(es)	Organization/Entity	Description
	Authority (KWA)	system was completed. The modifications to the FWTP would have contemplated treating raw water from KWA as well as the Flint River.
N/A	CDM Smith	CDM Smith performed the engineering review of Flint Water Treatment Plant (FWTP) following the switch back to DWSD in order to determine what further modifications are required before the FWTP can be used to treat raw water.
N/A	Tucker, Young, Jackson & Tull (now part of Alfred Bebesch & Co)	Prepared report regarding Flint's decision to switch to KWA, supposedly relied upon by State and Flint officials making the decision.
Matthew Davis, MD Chris Kolb Lawrence Reynolds Eric Rothstein , CPA Ken Sikkema	Flint Advisory Task Force	Prepared the March 2016 report entitled <i>Flint Water Advisory Task Force – Final Report</i> .